

2015R00282/JM

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

v.

MARIO WINANS

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:
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Criminal No. 16-

26 U.S.C. § 7203

442 (ES)

INFORMATION

The United States Attorney for the District of New Jersey charges:

COUNT ONE

(Failure to Make Tax Return)

1. At all times relevant to this Information:

a. Defendant MARIO WINANS was a resident of Fort Lee, New Jersey and worked as a singer, songwriter, music producer and multi-instrumentalist. At various times during the period relevant to this Information, defendant MARIO WINANS produced songs and albums for various rhythm and blues, hip-hop, and dance music artists, including several artists on the “Bad Boy” record label.

b. Yellow City, LLC (“Yellow City”) was a single member New Jersey Limited Liability Company and defendant MARIO WINANS was Yellow City’s 100% shareholder and registered agent.

c. Defendant MARIO WINANS maintained multiple business bank accounts in the name of Yellow City and was listed as the sole signatory, member and manager of Yellow City.

2. RioWorld, LLC (“RioWorld”) was a Delaware Limited Liability Company

formed on or about January 7, 2009, and defendant MARIO WINANS was listed as the sole member. On or about December 30, 2010, defendant MARIO WINANS opened a business bank account in the name of RioWorld.

3. At various times relevant to this Information, several companies, including music publishing companies and performing rights organizations, issued checks payable to Yellow City and RioWorld for payment of royalties due to defendant MARIO WINANS. Defendant MARIO WINANS deposited many of these checks into the Yellow City or RioWorld bank accounts.

4. At various times relevant to this Information, defendant MARIO WINANS received income in the form of payments made to satisfy certain of his outstanding liabilities and obligations.

5. During the calendar year 2008, defendant MARIO WINANS had and received total gross income in excess of approximately \$1,100,000.

6. Having received this income, defendant MARIO WINANS was required by law, following the close of the calendar year 2008, and on or before April 15, 2009, to make an income tax return to the Internal Revenue Service stating specifically the items of his gross income and any deductions and credits to which he was entitled.

7. On or about April 15, 2009, in Bergen County, in the District of New Jersey, and elsewhere, defendant

MARIO WINANS,

knowing and believing the foregoing facts, did knowingly and willfully fail to make an income tax return to the Internal Revenue Service.

In violation of Title 26, United States Code, Section 7203 and Title 18, United States Code, Section 2.

COUNT TWO
(Failure to Make Tax Return)

1. The allegations set forth in paragraphs 1 through 4 of Count One of this Information are realleged as if set forth in full herein.

2. During the calendar year 2009, defendant MARIO WINANS had and received total gross income in excess of approximately \$386,000.

3. Having received this income, defendant MARIO WINANS was required by law, following the close of the calendar year 2009, and on or before April 15, 2010, to make an income tax return to the Internal Revenue Service stating specifically the items of his gross income and any deductions and credits to which he was entitled.

4. On or about April 15, 2010, in Bergen County, in the District of New Jersey, and elsewhere, defendant

MARIO WINANS,

knowing and believing the foregoing facts, did knowingly and willfully fail to make an income tax return to the Internal Revenue Service.

In violation of Title 26, United States Code, Section 7203 and Title 18, United States Code, Section 2.

COUNT THREE
(Failure to Make Tax Return)

1. The allegations set forth in paragraphs 1 through 4 of Count One of this Information are realleged as if set forth in full herein.

2. During the calendar year 2010, defendant MARIO WINANS had and received total gross income in excess of approximately \$544,000.

3. Having received this income, defendant MARIO WINANS was required by law, following the close of the calendar year 2010, and on or before April 18, 2011, to make an income tax return to the Internal Revenue Service stating specifically the items of his gross income and any deductions and credits to which he was entitled.

4. On or about April 18, 2011, in Bergen County, in the District of New Jersey, and elsewhere, defendant

MARIO WINANS,

knowing and believing the foregoing facts, did knowingly and willfully fail to make an income tax return to the Internal Revenue Service.

In violation of Title 26, United States Code, Section 7203 and Title 18, United States Code, Section 2.

COUNT FOUR
(Failure to Make Tax Return)

1. The allegations set forth above in paragraphs 1 through 4 of Count One of this Information are realleged as if set forth in full herein.

2. During the calendar year 2011, defendant MARIO WINANS had and received total gross income in excess of approximately \$260,000.

3. Having received this income, defendant MARIO WINANS was required by law, following the close of the calendar year 2011, and on or before April 17, 2012, to make an income tax return to the Internal Revenue Service stating specifically the items of his gross income and any deductions and credits to which he was entitled.

4. On or about April 17, 2012, in Bergen County, in the District of New Jersey, and elsewhere, defendant

MARIO WINANS,

knowing and believing the foregoing facts, did knowingly and willfully fail to make an income tax return to the Internal Revenue Service.

In violation of Title 26, United States Code, Section 7203 and Title 18, United States Code, Section 2.

COUNT FIVE
(Failure to Make Tax Return)

1. The allegations set forth in paragraphs 1 through 4 of Count One of this Information are realleged as if set forth in full herein.

2. During the calendar year 2012, defendant MARIO WINANS had and received total gross income in excess of approximately \$602,000.


3. Having received this income, defendant MARIO WINANS was required by law, following the close of the calendar year 2012, and on or before April 15, 2013, to make an income tax return to the Internal Revenue Service stating specifically the items of his gross income and any deductions and credits to which he was entitled.

4. On or about April 15, 2013, in Bergen County, in the District of New Jersey, and elsewhere, defendant

MARIO WINANS,

knowing and believing the foregoing facts, did knowingly and willfully fail to make an income tax return to the Internal Revenue Service.

In violation of Title 26, United States Code, Section 7203 and Title 18, United States Code, Section 2.


PAUL J. FISHMAN
United States Attorney

CASE NUMBER: 2015R00282

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District of New Jersey**

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INFORMATION FOR

26 U.S.C. § 7203

PAUL J. FISHMAN

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